

Atty. Docket 20-EB-5009

**REMARKS**

Claims 1 and 3-20 stand rejected as being fully anticipated by U.S. patent application publication No. 2001/0032109 A1 (Gonyea). Reconsideration of the rejections is solicited in view of the following remarks.

Regarding any rejection under §102, it is noted that the test for anticipation is whether all the elements and operational relationships of the rejected claim are found within a single prior art reference. There must not be any differences between the claimed invention and the reference disclosure as viewed by a person of ordinary skill in the art. Absent from the reference disclosure of any claim element and/or operational interrelationship negates anticipation under §102.

**Gonyea is of limited relevance.**

Gonyea is directed to a system and method for predicting the timing and costs of future service events for a product. See Abstract of Gonyea. It is respectfully submitted that Gonyea's main applicability, as described by Gonyea, is directed to predicting costs and a maintenance schedule for the duration of a long term service agreement for a product, as opposed to a method and system for self-directed assistance of equipment service personnel in identifying replacement parts for selected locomotive equipment while present at an equipment work site to perform a servicing operation for a locomotive during the actual performance of such operations. Although Gonyea's scheduling and cost prediction system can be used in a locomotive, the basic fact remains that Gonyea is not directed to solving problems encountered by service personnel who is performing actual hands-on maintenance operations for the product. By way of comparison, Gonyea is directed to facilitate the planning of such operations *for future performance*. Consequently, at least some of the structural and operational relationships claimed in the present invention are lacking in

Atty. Docket 20-EB-5009

Gonyea. Below is a description of exemplary grounds as to why claim 1 is not anticipated or otherwise rendered unpatentable by Gonyea.

**Gonyea fails to teach graphical hyperlinks for the identification of parts.**

Claim 1 is directed to a computerized method for servicing a locomotive and identifying replacement parts for selected locomotive equipment. A service personnel is equipped to perform the action of identifying the replacement parts, as that personnel performs a servicing operation for the locomotive. In contrast to the claimed invention, Gonyea is not concerned with communicating any information to service personnel while that service personnel performs an actual repair of equipment while on site. Gonyea is rather concerned with assisting a maintenance planner to arrange for the yearly or daily maintenance planning for a product and for predicting costs associated with such future maintenance services.

More particularly, claim 1 recites that each part is identified by providing a series of linked schematic representations of the selected assembly and any subassemblies thereof and respective parts. The series of linked schematic representations comprises a plurality of graphical hyperlinks embedded on respective visual representations of the selected locomotive equipment. Activation of at least some of the plurality of graphical hyperlinks embedded on the respective visual representations of the selected locomotive equipment enables the service personnel to graphically navigate from the selected assembly to any relevant subassembly and replacement parts. By way of comparison, Gonyea does not use any graphical hyperlinks embedded on respective visual representations of the selected locomotive equipment for selecting a piece of equipment to look at. Gonyea discloses at paragraph 20 design curves 48 that include graphical representations of the performance of a part, in terms of operating hours, for a given set of operating conditions. However, this graphical representations of the performance of a part are used for predicting when a part

## Atty. Docket 20-EB-5009

should be replaced and have nothing to do with using graphical hyperlinks embedded on respective visual representations of the selected locomotive equipment so that the technician is able to select a piece of equipment to look at in order to perform a servicing task. Gonyea clearly discloses in great level of detail information for determining future inspection of parts and associated costs, such as information regarding operational conditions and design parameters for the parts. However, none of these aspects of Gonyea are designed to provide graphical hyperlinks embedded on respective visual representations of the selected locomotive equipment so that the technician is able to select a piece of equipment to look at in order to perform a servicing task.

Once again, applicant respectfully stresses that Gonyea's applicability is for the planning of future maintenance events and not for present performance of such events on the equipment work site, and, thus, it is respectfully submitted that Gonyea fails to teach or suggest the above-noted operational and/or structural relationships, and, consequently, does not and cannot anticipate claim 1 under the statutory standards of § 102. Since each of claims 3-18 that depend from claim 1 includes the structural and/or operational relationships respectively recited in such independent claim 1, it is also respectfully submitted that the applied art also fails to anticipate or otherwise render unpatentable each of such dependent claims.

Claim 19 is directed to computerized method for self-directed assistance of equipment service personnel identifying replacement parts for selected locomotive equipment and a selected system thereof while present at an equipment work site to perform a servicing operation for a locomotive. Detailed parts data, as may be stored in a database, includes graphical reproductions of the selected equipment with each reproduction being arranged into selectable segments comprising a plurality of graphical hyperlinks embedded on such graphic representations of the selected locomotive equipment. At least some of the plurality of graphical hyperlinks embedded on the respective graphical representations of the selected locomotive equipment are activated for remotely

Atty. Docket 20-EB-5009

retrieving from the database detailed parts data about a selected assembly using a level of representation sufficiently detailed to enable service personnel to perform a desired service of the selected assembly. It is respectfully submitted that Gonyea also fails to anticipate or otherwise render unpatentable claim 19 since Gonyea fails to teach or suggest the structural and/or operational relationships respectively recited in claim 19.

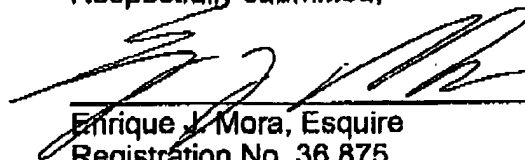
Claim 20 is directed to a computerized system for servicing a locomotive and identifying replacement parts for selected locomotive equipment and a selected system thereof. The identification of the parts is performed by service personnel as that personnel performs a servicing operation for the locomotive. It is respectfully submitted that Gonyea also fails to anticipate or otherwise render unpatentable claim 20 since Gonyea fails to teach or suggest the structural and/or operational relationships respectively recited in claim 20.

It is respectfully submitted that each of the claims pending in this application recites patentable subject matter and it is further submitted that such claims comply with all statutory requirements and thus each of such claims should be allowed.

The applicant appreciates the Examiner's efforts for conducting a thorough examination, and cordially invites the Examiner to call the undersigned attorney if there are any outstanding items that may be resolved via telephone conference.

Dated this 23<sup>rd</sup> day of December 2004.

Respectfully submitted,



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